

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

City of El Cenizo, Texas, Mayor Raul L.
Reyes of City of El Cenizo, Maverick
County, Maverick County Sheriff
Tom Schmerber, Maverick County Constable
Pct. 3-1 Mario A. Hernandez, and League of
United Latin American Citizens,

Plaintiffs,

v.

State of Texas, Governor Greg Abbott (In
His Official Capacity), and Texas Attorney
General Ken Paxton (In His Official
Capacity)

Defendants.

Civil Action No. 5:17-cv-404-OLG

APPLICATION FOR PRELIMINARY INJUNCTION

Plaintiffs hereby apply to the Court for a preliminary injunction enjoining all Defendants from enforcing Texas Senate Bill 4 (“SB 4”). The application is made on the basis of declarations and Memorandum in Support of Plaintiffs’ Application for Preliminary Injunction filed herewith.

As set forth in detail in the Memorandum, Plaintiffs have established that they are likely to succeed on the merits of their claims that SB 4 violates the Constitution; that Plaintiffs will suffer irreparable harm if the Court does not enjoin SB 4; that the Defendants will suffer no harm if the Court preserves the status quo pending adjudication of this matter on the merits; that the balance of hardships tips strongly in Plaintiffs’ favor; and that a preliminary injunction in this case advances the public interest.

For these reasons and the reasons detailed in the accompanying Memorandum in Support of Plaintiffs' Application for Preliminary Injunction, Plaintiffs respectfully request that the Court grant their Application.

Dated: June 5, 2017

Respectfully Submitted,

Lee Gelernt
Omar C. Jadwat
Andre I. Segura
Spencer E. Amdur
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
Phone: (212) 549-2600
Fax: (212) 549-2654
lgelernt@aclu.org
ojadwat@aclu.org
asegura@aclu.org
samdur@aclu.org

Edgar Saldivar
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF TEXAS
1500 McGowen Street, Suite 250
Houston, TX 77004
Phone: (713) 325-7011
esaldivar@aclutx.org

Cecillia D. Wang
Cody H. Wofsy
Stephen Kang*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
39 Drumm Street
San Francisco, CA 94111
Tel: (415) 343-0770
cwang@aclu.org
cwofsy@aclu.org

**Pro Hac Vice Forthcoming*

/s/ Luis Roberto Vera, Jr.
Luis Roberto Vera, Jr.
LULAC National General Counsel
SBN: 20546740
THE LAW OFFICE OF LUIS ROBERTO VERA, JR.
& ASSOCIATES
1325 Riverview Towers
111 Soledad
San Antonio, TX 78205-2260
Phone: (210) 225-3300
Fax: (210) 225-2060
lrvlaw@sbcglobal.net

Max Renea Hicks
LAW OFFICE OF MAX RENEA HICKS
P.O. Box 303187
Austin, TX 78703
Phone: (512) 480-8231
rhicks@renea-hicks.com

Attorneys for the Plaintiffs

CERTIFICATE OF SERVICE

I, Luis Vera, Jr., hereby certify that on June 5, 2017 copies of this Application for Preliminary Injunction were electronically filed via the Court's CM/ECF system.

Dated: June 5, 2017

/s/ Luis Roberto Vera, Jr.

Luis Roberto Vera, Jr.

LULAC National General Counsel

SBN: 20546740

THE LAW OFFICE OF LUIS ROBERTO VERA,

JR. & ASSOCIATES

1325 Riverview Towers

111 Soledad

San Antonio, TX 78205-2260

Phone: (210) 225-3300

Fax: (210) 225-2060

lrvlaw@sbcglobal.net